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Garrett A. Fail

Attorneys for Lehman Brothers Holdings Inc.
and Certain of Its Affiliates

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re	:	Chapter 11 Case No.
	:	
LEHMAN BROTHERS HOLDINGS INC., et al.,	:	08-13555 (SCC)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X		

**CERTIFICATE OF NO OBJECTION
UNDER 28 U.S.C. § 1746 REGARDING THE
PLAN ADMINISTRATOR'S FOUR HUNDRED
EIGHTY-SEVENTH OMNIBUS OBJECTION TO CLAIMS
(SATISFIED GUARANTEE CLAIMS) SOLELY AS TO CERTAIN CLAIMS**

TO THE HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures [ECF No. 9635] (the "Second Amended Case Management Order"), the undersigned hereby certifies as follows:

1. On November 26, 2014, Lehman Brothers Holdings Inc. (the "Plan Administrator"), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors, filed the Four Hundred

Eighty-Seventh Omnibus Objection to Claims (Satisfied Guarantee Claims) [ECF No. 47079]
(the “Claims Objection”) with the Court for hearing.

2. In accordance with the Second Amended Case Management Order, the Plan Administrator established a deadline (the “Response Deadline”) for parties to object or file responses to the Claims Objection. The Response Deadline was set for December 29, 2014 at 4:00 p.m. The Second Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections or other responsive pleadings have been filed on or prior to the relevant response deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.

3. The Response Deadline has now passed and, to the best of my knowledge, no responsive pleadings to the Claims Objection concerning the claims listed on Exhibit A attached hereto have been (a) filed with the Court on the docket of the above-referenced cases in accordance with the procedures set forth in the Second Amended Case Management Order, or (b) served on counsel to the Plan Administrator. Accordingly, the Plan Administrator respectfully requests that the proposed order granting the Claims Objection annexed hereto as Exhibit B be entered in accordance with the procedures described in the Second Amended Case Management Order **solely as to the claims listed on Exhibit A attached hereto.**

I declare that the foregoing is true and correct.

Dated: January 6, 2015
New York, New York

/s/ Garrett A. Fail
Garrett A. Fail

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EXHIBIT A

OMNIBUS OBJECTION 487: EXHIBIT A - SATISFIED GUARANTEE CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	REASON FOR PROPOSED DISALLOWANCE
1 DEUTSCHE BANK SECURITIES, INC.	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/14/2009	12598	\$2,400,000.00	\$2,400,000.00	Creditor filed Primary Claim No. 12597 against LOTC in the amount of \$2,400,000, which is disputed. LOTC is reserving 100% of the filed amount of the Primary Claim.
2 ROYAL BANK OF CANADA	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/16/2009	14049	\$3,539,126.48 *	\$3,539,126.48*	Creditor filed Primary Claim No. 14048 against LBCC in the amount of \$3,539,126.48, which is disputed. LBCC is reserving 100% of the filed amount of the Primary Claim.

EXHIBIT B
(Proposed Order – ECF No. 47078)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : Chapter 11 Case No.
 :
LEHMAN BROTHERS HOLDINGS INC., *et al.*, : 08-13555 (SCC)
 :
Debtors. : (Jointly Administered)
-----X

**ORDER GRANTING THE PLAN ADMINISTRATOR'S
FOUR HUNDRED EIGHTY-SIXTH OMNIBUS OBJECTION TO CLAIMS
(SATISFIED GUARANTEE CLAIMS) SOLELY AS TO CERTAIN CLAIMS**

Upon the four hundred eighty-seventh omnibus objection to claims, dated November 26, 2014 (the "Four Hundred Eighty-Seventh Omnibus Objection to Claims"),¹ of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors for the entities in the above-referenced chapter 11 cases, pursuant to section 502(b) of title 11 of the Bankruptcy Code, Rule 3007(d) of the Bankruptcy Rules, and this Court's order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664], seeking disallowance of the Satisfied Guarantee Claims, all as more fully described in the Four Hundred Eighty-Seventh Omnibus Objection to Claims; and due and proper notice of the Four Hundred Eighty-Seventh Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Four Hundred Eighty-Seventh Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and factual bases set forth in the Four Hundred Eighty-Seventh Omnibus Objection to Claims establish just cause

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred Eighty-Seventh Omnibus Objection to Claims.

for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Four Hundred Eighty-Seventh Omnibus Objection to Claims is granted solely with respect to the claims listed on Exhibit 1 attached hereto; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 annexed hereto are disallowed and expunged in their entirety; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2015
New York, New York

UNITED STATES BANKRUPTCY JUDGE

EXHIBIT 1

OMNIBUS OBJECTION 487: EXHIBIT 1 - SATISFIED GUARANTEE CLAIMS

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